

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHRISTOPHER UNDERWOOD, LOUIS  
OBERLANDER, and HENRY RODRIGUEZ,  
individually and on behalf of all others similarly  
situated,

No. 1:21-cv-08353-PAE

*Plaintiffs,*

v.

COINBASE GLOBAL, INC.,

*Defendants.*

**DECLARATION OF JORDAN A. GOLDSTEIN IN SUPPORT OF PLAINTIFFS'**  
**MOTION FOR A TEMPORARY RESTRAINING ORDER AND A**  
**PRELIMINARY INJUNCTION**

Jordan A. Goldstein, pursuant to 28 U.S.C. § 1746, declares under the penalty of perjury, as follows:

1. I am a partner of Selendy & Gay, PLLC. I am admitted to the bar of the State of New York and admitted to practice before this Court and am in good standing.
2. I am an attorney for the Lead Plaintiffs and putative Class in this action and submit this declaration in support of Plaintiffs' motion for a temporary restraining order and a preliminary injunction.
3. Annexed hereto as Exhibit A is a true and correct copy of the email that Defendant sent to Lead Plaintiff Christopher Underwood on January 26, 2022.
4. Annexed hereto as Exhibit B is a true and correct copy of Defendant's proposed amendment to the Coinbase User Agreement.
5. Annexed hereto as Exhibit C is a true and correct redline of the proposed amended User Agreement against the User Agreement from December 20, 2021.

6. Annexed hereto as Exhibit D is a true and correct copy of Coinbase's notice informing users that they must agree and comply with the new user agreement in order to continue using their accounts.

7. Annexed hereto as Exhibit E is a true and correct copy of the letter that Plaintiffs sent to Defendant's counsel on January 26, 2022.

8. Annexed hereto as Exhibit F is a true and correct copy of Defendant's January 27, 2022 response to Plaintiffs' January 26, 2022 letter.

9. Annexed hereto as Exhibit G is a true and correct copy of Plaintiffs' January 27, 2022 email to Defendant regarding Plaintiffs' intention to move for a temporary restraining order today if Defendant did not consent to the requested relief.

10. Annexed hereto as Exhibit H is a true and correct copy of the response to Plaintiffs' January 27, 2022 email.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: January 28, 2022  
New York, New York

By: /s/ Jordan A. Goldstein  
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